




Exhibit A

Appendix XII-B1

	CIVIL CASE INFORMATION STATEMENT (CIS)		FOR USE BY CLERK'S OFFICE ONLY	
	Use for initial Law Division Civil Part pleadings (not motions) under Rule 4:5-1 Pleading will be rejected for filing, under Rule 1:5-6(c), if information above the black bar is not completed or attorney's signature is not affixed		PAYMENT TYPE: <input type="checkbox"/> CK <input type="checkbox"/> CG <input type="checkbox"/> CA	
			CHG/CK NO.	
			AMOUNT:	
			OVERPAYMENT:	
		BATCH NUMBER:		
ATTORNEY / PRO SE NAME Jay L. Solnick, Esquire			TELEPHONE NUMBER (215) 481-9979	
COUNTY OF VENUE				
FIRM NAME (if applicable) Solnick & Associates, LLC			DOCKET NUMBER (when available)	
OFFICE ADDRESS 2851 Limekiln Pike Glenside, PA 19038			DOCUMENT TYPE Complaint	
			JURY DEMAND <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
NAME OF PARTY (e.g., John Doe, Plaintiff) Wally Euisuk Hwang		CAPTION Wally Euisuk Hwang and Jung Ha Hwang v. Lawrence Dodd, et al		
CASE TYPE NUMBER (See reverse side for listing) 603	HURRICANE SANDY RELATED? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	IS THIS A PROFESSIONAL MALPRACTICE CASE? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO IF YOU HAVE CHECKED "YES," SEE N.J.S.A. 2A:53 A -27 AND APPLICABLE CASE LAW REGARDING YOUR OBLIGATION TO FILE AN AFFIDAVIT OF MERIT.		
RELATED CASES PENDING? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		IF YES, LIST DOCKET NUMBERS		
DO YOU ANTICIPATE ADDING ANY PARTIES (arising out of same transaction or occurrence)? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		NAME OF DEFENDANT'S PRIMARY INSURANCE COMPANY (if known) <input type="checkbox"/> NONE <input type="checkbox"/> UNKNOWN		
THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE.				
CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION				
DO PARTIES HAVE A CURRENT, PAST OR RECURRENT RELATIONSHIP? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		IF YES, IS THAT RELATIONSHIP: <input type="checkbox"/> EMPLOYER/EMPLOYEE <input type="checkbox"/> FRIEND/NEIGHBOR <input type="checkbox"/> OTHER (explain) <input type="checkbox"/> FAMILIAL <input type="checkbox"/> BUSINESS		
DOES THE STATUTE GOVERNING THIS CASE PROVIDE FOR PAYMENT OF FEES BY THE LOSING PARTY? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO				
USE THIS SPACE TO ALERT THE COURT TO ANY SPECIAL CASE CHARACTERISTICS THAT MAY WARRANT INDIVIDUAL MANAGEMENT OR ACCELERATED DISPOSITION				
 DO YOU OR YOUR CLIENT NEED ANY DISABILITY ACCOMMODATIONS? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		IF YES, PLEASE IDENTIFY THE REQUESTED ACCOMMODATION		
WILL AN INTERPRETER BE NEEDED? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO		IF YES, FOR WHAT LANGUAGE? Korean		
I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with Rule 1:38-7(b).				
ATTORNEY SIGNATURE: 				

JAY L. SOLNICK, ESQUIRE
ATTORNEY I.D.: 05635-1994
SOLNICK & ASSOCIATES, LLC
2851 LIMEKILN PIKE
GLENSIDE, PA 19038
(215) 481-9979

ATTORNEY FOR PLAINTIFFS

WALLY EUISUK HWANG
225 East Manoa Road
Havertown, PA 19083

and

JUNG HA HWANG
225 East Manoa Road
Havertown, PA 19083

Plaintiffs

v.

LAWRENCE DODD
2129 North 77th Drive
Phoenix, AZ 85035

and

DODD TRUCKING LLC
2129 North 77th Drive
Phoenix, AZ 85035

and

DOLPHIN TRUCKING CORP
14905 S. Woodcrest Avenue
Homer Glen, IL 60491

and

TETYANA PAVLENKO
14905 S. Woodcrest Avenue
Homer Glen, IL 60491

Defendants

: SUPERIOR COURT OF NEW JERSEY
: MIDDLESEX COUNTY-CIVIL DIVISION

:

:

: DOCKET NO. _____

:

: CIVIL ACTION

:

:

: COMPLAINT, JURY DEMAND AND
: DESIGNATION OF TRIAL COUNSEL

:

:

:

:

:

:

:

:

:

:

:

:

:

:

:

:

Plaintiffs, Wally Euisuk Hwang and Jung Ha Hwang, by and through undersigned
counsel, in support of his Complaint, states the following:

COUNT I

1. Plaintiff, Wally Euisuk Hwang, is an adult individual who currently resides at the
address indicated in the above caption.

2. Plaintiff, Jung Ha Hwang, is an adult individual who currently resides at the address indicated in the above caption.

3. Defendant, Lawrence Dodd, is an adult individual who is believed to reside at the address indicated in the above caption.

4. Defendant, Dodd Trucking LLC, is, upon information and belief, a business entity organized and existing under the laws of the state of Arizona with offices and/or a place of business at the address indicated in the above caption.

5. Defendant, Dolphin Trucking Corp, is, upon information and belief, a business entity organized and existing under the laws of the state of Illinois with offices and/or a place of business at the address indicated in the above caption.

6. Defendant, Tetyana Pavlenko, is an adult individual who currently resides and/conducts business at the address indicated in the above caption.

7. At the time of the subject incident as described herein, Defendant, Lawrence Dodd, was employed by and/or acting as the agent for Defendant, Dodd Trucking LLC, Defendant, Dodd Trucking LLC, and/or Defendant, Tetyana Pavlenko, acting within the course and scope of his employment and/or agency.

8. On September 26, 2020, at approximately 12:40 PM, Plaintiff, Wally Euisuk Hwang, was the operator, and Plaintiff, Jung Ha Hwang, the passenger, of a motor vehicle stopped in the parking lot of the Thomas Edison Service Area on the New Jersey Turnpike in Woodbridge Township NJ, when suddenly and without warning, Plaintiffs' vehicle was violently struck by a tractor-trailer operated by Defendant, Lawrence Dodd.

8. The foregoing accident and all of the injuries and damages set forth herein after sustained by Plaintiff, Wally Euisuk Hwang, were the direct and proximate result of the negligent and careless manner in which Defendant, Lawrence Dodd, operated his vehicle.

9. As a result of the foregoing incident, Plaintiff, Wally Euisuk Hwang, sustained painful and severe injuries which include, but are not limited to disc herniation at L4-5, disc protrusion at L3-4 with annular tear, disc protrusion with annular tear at L5-S1, disc protrusion at L2-3 and L1-2 with peripheral annular tear at the L2-3 level, cervicalgia, sciatica, lumbar sprain/strain.

10. As a result of the foregoing incident, Plaintiff, Wally Euisuk Hwang, suffered and continues to be plagued by persistent pain and limitation, and therefore, avers that his injuries may be of a permanent nature, causing residual problems for the remainder of his lifetime.

11 As a result of the foregoing accident, Plaintiff, Wally Euisuk Hwang, has suffered physical pain, mental anguish, and loss of enjoyment of life.

12. As a result of the foregoing accident, Plaintiff, Wally Euisuk Hwang, has had to undergo otherwise unnecessary medical treatment and has incurred unreimbursed medical expenses.

WHEREFORE, Plaintiff, Wally Euisuk Hwang, demands judgment against Defendant, Lawrence Dodd, for injuries and damages plus interest and costs of suit.

COUNT II

1. Plaintiffs hereby incorporate the allegations of Count I of this Complaint as though fully set forth at length.

2. As a result of the foregoing incident, Plaintiff, Jung Ha Hwang, sustained painful and severe injuries which include, but are not limited to cervicgia, lumbar radiculopathy, sprain and strain of the cervical spine, thoracic spine and lumbar spine, left ankle injury.

3. As a result of the foregoing incident, Plaintiff, Jung Ha Hwang, suffered and continues to be plagued by persistent pain and limitation, and therefore, avers that her injuries may be of a permanent nature, causing residual problems for the remainder of her lifetime.

4. As a result of the foregoing accident, Plaintiff, Jung Ha Hwang, has suffered physical pain, mental anguish, and loss of enjoyment of life.

5. As a result of the foregoing accident, Plaintiff, Jung Ha Hwang, has had to undergo otherwise unnecessary medical treatment and has incurred unreimbursed medical expenses.

WHEREFORE, Plaintiff, Jung Ha Hwang, demands judgment against Defendant, Lawrence Dodd, for injuries and damages plus interest and costs of suit.

COUNT III

1. Plaintiffs hereby incorporate the allegations of Counts I and II of this Complaint as though fully set forth at length.

2. Defendant, Dodd Trucking LLC, is vicariously liable for the injuries and damages sustained by Plaintiffs as more fully set forth herein.

WHEREFORE, Plaintiff, Wally Euisuk Hwang, demands judgment against Defendant, Dodd Trucking LLC, for injuries and damages plus interest and costs of suit.

COUNT IV

1. Plaintiffs hereby incorporate the allegations of Counts I, II and III of this Complaint as though fully set forth at length.

WHEREFORE, Plaintiff, Jung Ha Hwang, demands judgment against Defendant, Dodd Trucking LLC, for injuries and damages plus interest and costs of suit.

COUNT V

1. Plaintiffs hereby incorporate the allegations of Counts I through IV of this Complaint as though fully set forth at length.

2. Defendant, Dolphin Trucking Corp, is vicariously liable for the injuries and damages sustained by Plaintiffs as more fully set forth herein.

WHEREFORE, Plaintiff, Wally Euisuk Hwang, demands judgment against Defendant, Dolphin Trucking Corp, for injuries and damages plus interest and costs of suit.

COUNT VI

1. Plaintiffs hereby incorporate the allegations of Counts I through V of this Complaint as though fully set forth at length.

WHEREFORE, Plaintiff, Jung Ha Hwang, demands judgment against Defendant, Dolphin Trucking Corp, for injuries and damages plus interest and costs of suit.

COUNT VII

1. Plaintiffs hereby incorporate the allegations of Counts I through VI of this Complaint as though fully set forth at length.

2. Defendant, Tetyana Pavlenko, is vicariously liable for the injuries and damages sustained by Plaintiffs as more fully set forth herein.

WHEREFORE, Plaintiff, Wally Euisuk Hwang, demands judgment against Defendant, Tetyana Pavlenko, for injuries and damages plus interest and costs of suit.

COUNT VIII

1. Plaintiffs hereby incorporate the allegations of Counts I through VII of this Complaint as though fully set forth at length.

WHEREFORE, Plaintiff, Jung Ha Hwang, demands judgment against Defendant, Tetyana Pavlenko, for injuries and damages plus interest and costs of suit.

JURY DEMAND

Plaintiffs demand a trial by jury.

DESIGNATION OF TRIAL COUNSEL

Jay L. Solnick, Esquire is hereby designated trial counsel for Plaintiffs relative to the above-captioned matter.

CERTIFICATION

I certify that the matter in controversy is not the subject of any other action or arbitration hearing, now or contemplated, and that no other parties need be joined in this action.

SOLNICK & ASSOCIATES, LLC

By: 
JAY L. SOLNICK, ESQUIRE
Attorney for Plaintiffs

Civil Case Information Statement

Case Details: MIDDLESEX | Civil Part Docket# L-004280-22

Case Caption: HWANG WALLY VS DODD LAWRENCE

Case Initiation Date: 08/25/2022

Attorney Name: JAY L SOLNICK

Firm Name: SOLNICK & ASSOCIATES, LLC

Address: 2851 LIMEKILN PIKE

GLENSIDE PA 19038

Phone: 2154819979

Name of Party: PLAINTIFF : Hwang, Wally, E

Name of Defendant's Primary Insurance Company

(if known): Unknown

Case Type: AUTO NEGLIGENCE-PERSONAL INJURY (NON-
VERBAL THRESHOLD)

Document Type: Complaint with Jury Demand

Jury Demand: YES - 6 JURORS

Is this a professional malpractice case? NO

Related cases pending: NO

If yes, list docket numbers:

**Do you anticipate adding any parties (arising out of same
transaction or occurrence)?** NO

Does this case involve claims related to COVID-19? NO

Are sexual abuse claims alleged by: Wally E Hwang? NO

Are sexual abuse claims alleged by: Jung H Hwang? NO

THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE

CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION

Do parties have a current, past, or recurrent relationship? NO

If yes, is that relationship:

Does the statute governing this case provide for payment of fees by the losing party? NO

**Use this space to alert the court to any special case characteristics that may warrant individual
management or accelerated disposition:**

Do you or your client need any disability accommodations? NO

If yes, please identify the requested accommodation:

Will an interpreter be needed? YES

If yes, for what language:

KOREAN,KOREAN

Please check off each applicable category: Putative Class Action? NO **Title 59?** NO **Consumer Fraud?** NO

I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with *Rule 1:38-7(b)*

08/25/2022

Dated

/s/ JAY L SOLNICK

Signed

